



*Consulting Engineers  
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February 12, 2008  
(PBW Project No. 1432)

VIA OVERNIGHT COURIER

Mr. Gary Miller  
Superfund Division, Region 6 (6SF-AP)  
Arkansas/Texas Section  
U.S. Environmental Protection Agency  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Re: January 2008 Monthly Status Report, Gulfco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller:

Pursuant to Section XII, Paragraph 53 of the amended Unilateral Administrative Order (UAO) for the above-referenced Site, Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly status report on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow). As discussed in our telephone conversation on August 2, 2005, monthly status reports for a given month will be submitted by the 15<sup>th</sup> of the following month as required in Paragraph 53 of the UAO, rather than by the 10<sup>th</sup> of the following month as indicated in Appendix 1 of the UAO. In accordance with the UAO requirements this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – The following actions were taken during the previous month:
  - RI/FS site characterization activities (SOW Paragraphs 34 through 36) detailed under Task 6 of the RI/FS Work Plan including:
    - Subtask 6.3 – Validation of laboratory data for soil samples collected from 15 locations within the area of the Site south of Marlin Avenue (the South Area), and 7 locations within the area of the Site north of Marlin Avenue (the North Area) was partially completed.
    - Subtask 6.5 – Validation of laboratory data for a groundwater sample from monitoring well NE3MW30B and a soil sample from the boring for this well was completed. Evaluation of these data was performed and a letter proposing Phase 4 groundwater investigation activities was sent to you on January 15, 2008. Based on your verbal comments provided on January 28, 2007, a revised version of this letter is being prepared.
    - Subtask 6.7 – Laboratory analyses of wetlands sediment samples collected from the 0 to 0.5 foot depth interval at nine locations (3WSED1 through 3WSED9) and from the 1 to 2 foot depth interval at location 2WSED9 were completed. Validation of the data from these analyses was partially completed.

- Risk Assessment activities (SOW Paragraphs 37) detailed under Task 7 of the RI/FS Work Plan - data analysis, human health risk evaluation and ecological risk evaluation were partially completed.
2. Results of sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – The following data were received or generated during the previous month:
- The validation reports for the NE3MW30B soil and groundwater samples described above is provided in electronic form on the enclosed DVD.
  - Unvalidated analytical laboratory reports for the wetland sediment sample analyses described above are provided in electronic form on the enclosed DVD.
  - The updated database, including all data validated through January 31, 2008 is provided in electronic format on the enclosed DVD.
3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of work – The following actions are planned for the next two months:
- RI/FS site characterization activities (SOW Paragraphs 34 through 36) detailed under Task 6 of the RI/FS Work Plan (weather and access permitting) including:
    - Subtask 6.3 – Soil investigation – to be continued through soil sample data validation, and data evaluation.
    - Subtask 6.5 – Groundwater/NAPL investigation – to be continued through monitoring well/piezometer installation and development, groundwater sampling and analysis, hydraulic testing, data validation, and data evaluation.
    - Subtask 6.7 – Sediment investigation – to be continued through sample collection, sample analyses, data validation, and data evaluation.
  - Risk Assessment activities (SOW Paragraphs 37) detailed under Task 7 of the RI/FS Work Plan – to be continued through data analysis, human health risk evaluation and ecological risk evaluation.
4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – RI/FS activities are approximately 70% complete. No delays were encountered this month.

Although not required by the UAO, a meeting between Chromalloy, Dow, and EPA representatives was held on January 16, 2008 to discuss possible use of a removal action approach for performance of remaining project activities with the goal of obtaining construction completion by September 30, 2008, coupled with a partial delisting of the Site. During this meeting agency personnel and company representatives both agreed to work toward this approach. It was also agreed that the EPA and company technical representatives would develop

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a revised project schedule while the legal representatives would begin developing an Agreed Order on Consent (AOC) incorporating this approach.

Thank you for the opportunity to submit this status report. Should you have any questions, please do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.  
Principal Engineer

cc: Mr. Doug McReynolds – EA Engineering, Science and Technology  
Ms. Luda Voskov – Texas Commission on Environmental Quality  
Mr. Robert L. Iulucci - Sequa Corporation  
Mr. Brent Murray – Environmental Quality, Inc.  
Mr. Rob Rouse - The Dow Chemical Company  
Mr. Allen Daniels - LDL Coastal Limited, LP  
Mr. F. William Mahley - Strasburger & Price, LLP  
Mr. James C. Morriss III - Thompson & Knight, LLP  
Ms. Elizabeth Webb - Thompson & Knight, LLC